

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH,
individually and as parent and legal
guardian of W.W., K.W., G.W., and L.W.,
minor children, and MATTHEW
WADSWORTH,

Plaintiffs,

vs.

WALMART INC. and JETSON
ELECTRIC BIKES, LLC,

Defendants.

Case No. 2:23-CV-118-KHR

ATTACHMENT D: DEFENDANTS' WITNESS LIST FOR TRIAL

WALMART INC. ("Walmart") and JETSON ELECTRIC BIKES, LLC ("Jetson"),
(collectively "Defendants"), by and through their attorneys, Crowley Fleck PLLP and McCoy Leavitt
Laskey LLC, **will call** the following witnesses to testify at trial:

1. Stephanie Wadsworth, 1620 Highway 374, Green River, WY (in person). Mrs. Wadsworth will be called to testify regarding the purchase of the subject hoverboard, the events leading up to, during, and following the subject fire at the home located at 1620 Highway 374, Green River, Wyoming on or about February 1, 2022. She will testify regarding the Wadsworths' actions or inactions before, during, and after the subject fire, and any personal injuries sustained. Further, Mrs. Wadsworth will testify regarding the claims for negligence, strict liability, breach of warranty, and loss of consortium actions. Finally, Mrs. Wadsworth will testify regarding the alleged medical special damages, future medical special damages, and permanency claims. Mrs. Wadsworth may testify to

other relevant matters addressed during her deposition.

2. Matthew Wadsworth, 1620 Highway 374, Green River, WY (in person). Mr. Wadsworth will be called to testify regarding the purchase of the subject hoverboard, the events leading up to, during, and following the subject fire at the home located at 1620 Highway 374, Green River, Wyoming on or about February 1, 2022. He will testify regarding the Wadsworths' actions or inactions before, during, and after the subject fire, and any personal injuries sustained. Further, Mr. Wadsworth will testify regarding the claims for negligence, strict liability, breach of warranty, and loss of consortium actions. Finally, Mr. Wadsworth will testify regarding the alleged medical special damages, future medical special damages, and permanency claims. Mr. Wadsworth may testify to other relevant matters addressed during his deposition.

3. K.W. (in person), 1620 Highway 374, Green River, WY (in person). K.W. will be called to testify regarding the events leading up to, during, and following the subject fire at the home located at 1620 Highway 374, Green River, Wyoming on or about February 1, 2022. She will testify regarding the Wadsworths' actions or inactions before, during, and after the subject fire, and any personal injuries sustained. She will testify regarding the claims for negligence, strict liability and breach of warranty. Finally, K.W. will testify regarding the alleged medical special damages, future medical special damages, and permanency claims. K.W. may testify to other relevant matters addressed during her deposition.

4. G.W. (in person), 1620 Highway 374, Green River, WY (in person). G.W. will be called to testify regarding the events leading up to, during, and following the subject fire at the home located at 1620 Highway 374, Green River, Wyoming on or about February 1, 2022. He will testify regarding the Wadsworths' actions or inactions before, during, and after the subject fire, and any personal injuries sustained. He will testify regarding the claims for negligence, strict liability and breach of warranty. Finally, G.W. will testify regarding the alleged medical special

damages, future medical special damages, and permanency claims. G.W. may testify to other relevant matters addressed during his deposition.

5. L.W. (in person), 1620 Highway 374, Green River, WY (in person). L.W. will be called to testify regarding the events leading up to, during, and following the subject fire at the home located at 1620 Highway 374, Green River, Wyoming on or about February 1, 2022. He will testify regarding the Wadsworths' actions or inactions before, during, and after the subject fire, and any personal injuries sustained. Further, he will testify regarding the claims for negligence, strict liability and breach of warranty. Finally, L.W. will testify regarding the alleged medical special damages, future medical special damages, and permanency claims. L.W. may testify to other relevant matters addressed during his deposition.

6. W.W. (in person), 1620 Highway 374, Green River, WY (in person). Upon information and belief, W.W. will testify regarding the events leading up to, during, and following the subject fire at the home located at 1620 Highway 374, Green River, Wyoming on or about February 1, 2022. He will testify regarding the Wadsworths' actions or inactions before, during, and after the subject fire, and any personal injuries sustained. Further, he will testify regarding the claims for negligence, strict liability and breach of warranty. Finally, W.W. will testify regarding the alleged medical special damages, future medical special damages, and permanency claims. W.W. may testify to other relevant matters addressed during his deposition.

7. Ryan Pasborg, 1700 Swanson Drive, Rock Springs, WY (in person or by prior deposition testimony). Mr. Pasborg entered the home and helped the Wadsworth family escape their home from the fire. He will be called to testify regarding the observations he made before, during and after his rescue efforts. Mr. Pasborg may testify to other relevant matters addressed during his deposition.

8. Ashley Merrell, Sweetwater County Sheriff's Department, 50140B U.S. Highway

191 South, Rock Springs, WY 32901 (in person or by prior deposition testimony). Mrs. Merrell was one of the responding officers on the day of the subject fire. She will be called to authenticate her body camera footage and will testify regarding the observations she made and interviews she conducted on the day of the fire.

9. Sam Husain, Jetson Electric Bikes, 86 34th Street, Brooklyn, NY (in person). Mr. Husain will be called to testify regarding the design, manufacture and distribution of the subject hoverboard. Mr. Husain will testify regarding the UL 2272 certification for the hoverboard and the process involved in obtaining the same. He will testify regarding TestCoo's third party inspections of Jetson's Plasma hoverboards. Mr. Husain will testify regarding the subject incident.

10. Coryn Kremers, Walmart, Inc., 702 Southwest 8th Street, Bentonville, AR (in person). Mrs. Kremers is the Senior Director for Walmart's U.S. Product Safety and Compliance Department. She will be called to testify regarding Walmart's product approval and test process. Mrs. Kremers will also testify regarding the subject incident.

11. Greg Gorbett, Fire Dynamics Analysts, 330 Eastern Bypass, Richmond, KY (in person). Mr. Gorbett will offer expert testimony in the area of fire modeling and fire dynamics engineering and investigations. His testimony will be consistent with his written report, file materials and deposition in this case.

12. Brian Strandjord, AEI Corporation, 8197 West Brandon Drive, Littleton, CO (in person). Mr. Strandjord will offer expert testimony in the area of mechanical and electrical engineering and failure investigations. His testimony will be consistent with his written report, file materials and deposition in this case.

13. Joe Filas, Rimkus Consulting Group, Inc., 8100 S. Akron Street, Centennial, CO (in person). Mr. Filas will offer expert testimony in the area of origin and cause investigations. His testimony will be consistent with his written report, file materials and deposition in this case.

14. Samuel Sudler, SEA, Ltd., 795 Cromwell Park Drive, Glen Burnie, MD (in person). Mr. Sudler will offer expert testimony in the area of electrical engineering and failure investigations. His testimony will be consistent with his written report, file materials and deposition in this case.

15. Cloie Johnson, OSC Vocational Systems, Inc., 10132 NE 185th Street, Bothell, WA (in person). Mrs. Johnson will offer expert testimony in the area of vocational rehabilitation and life care planning. Her testimony will be consistent with her written report, file materials and deposition in this case.

16. Charity Rowsey, Rowsey Financial Forensics LLC, P.O. Box 6326, Helena, MT (in person). Mrs. Rowsey will offer expert testimony based on her background as a certified public accountant and forensic financial investigator. Her testimony will be consistent with her written report, file materials and deposition in this case.

Additionally, the Defendants **may call** the following witnesses to testify at trial.

1. Lonnie Wadsworth, 1600 State Hwy 374, Green River, WY (in person or by prior deposition testimony). Lonnie Wadsworth is Matthew Wadsworth's father. He may be called to testify regarding the subject property, the incident, and the Wadsworths' alleged injuries and treatment.

2. Lavonne Wadsworth, 1600 State Hwy 374, Green River, WY (in person or by prior deposition testimony). Lavonne Wadsworth is Matthew Wadsworth's mother. She may be called to testify regarding the subject property, the incident, and the Wadsworths' alleged injuries and treatment.

3. Larry Erdmann, Green River Fire Department, 500 Shoshone Avenue, Green River, WY 82935 (in person or by prior deposition testimony). Assistant Chief Erdmann may be called

to testify regarding the observations he made and interviews he conducted during his investigation of the subject incident.

4. Jeff Sheaman, Sweetwater County Sheriff's Department, 50140B U.S. Highway 191 South, Rock Springs, WY 32901 (in person or by prior deposition testimony). Detective Sheaman may be called to testify regarding his investigation of the incident subject to the limitations in the Court's ruling on Defendants' *Daubert* motion.

5. Bill Robinson, Green River Fire Department, 500 Shoshone Avenue, Green River, WY 82935 (in person or by prior deposition testimony). Chief Robinson may be called to testify regarding his investigation of the incident subject to the limitations in the Court's ruling on Defendants' *Daubert* motion.

6. John Hansen, 35 Basco Avenue, Farson, WY 82932 (in person or by prior deposition testimony). Mr. Hansen of the Sweetwater County Sheriff's Department was one of the responding officers on the day of the subject fire. He may be called to authenticate his body camera footage and testify regarding the observations he made and interviews he conducted on the day of the fire.

7. Richard Kaumo, Sweetwater County Sheriff's Department, 50140B U.S. Highway 191 South, Rock Springs, WY 32901 (in person or by prior deposition testimony). Mr. Kaumo was one of the responding officers on the day of the subject fire. He may be called to testify regarding the observations he made on the day of the fire.

8. Jake Ribordy, Sweetwater County Sheriff's Department, 50140B U.S. Highway 191 South, Rock Springs, WY 32901 (in person or by prior deposition testimony). Mr. Ribordy was one of the responding officers on the day of the subject fire. He may be called to testify regarding the observations he made on the day of the fire.

9. JP Apostolope, Green River Fire Department, 500 Shoshone Avenue, Green River,

WY 82935 (in person or by prior deposition testimony). Mr. Apostolope may be called to testify regarding the observations he made when he responded to the subject fire.

10. Raymona Nuttall, 4125 Duncan Way, Fort Worth, TX (in person or by prior deposition testimony). Mrs. Nuttall is Matthew Wadsworth's grandmother and owner of the home where the fire occurred at 1600 State Hwy 374, Green River, WY. She may be called to testify regarding the subject property, the incident, and the Wadsworths' alleged injuries and treatment.

11. Giovanni Lewis, University of Utah Hospital, 50 N. Medical Drive, Salt Lake City, Utah 84132 (in person or by prior deposition testimony). Dr. Lewis is one of Mrs. Wadsworth and W.W.'s treating physicians and may be called to testify regarding their injuries and treatment.

12. Derek King, Berkeley Engineering & Research, Inc., 808 Gilman St., Berkeley, CA 94710 (in person). Mr. King is the Plaintiffs' designated electrical / battery expert. He may be called to testify regarding his written report, file materials and deposition in this case.

13. Michael Nelson, High Plains Physical Therapy, 920 Upland Way, Green River, WY 82935 (in person or by prior deposition testimony). Mr. Nelson was Mrs. Wadsworth's physical therapist. He may be called to testify regarding his treatment of Mrs. Wadsworth.

14. Ronald Snyder, Physiatry Life Care Planning Associates, 668 N. Orlando Ave., Unit 1018, Maitland, FL 32751 (in person). Dr. Snyder is the Plaintiffs' designated life care plan expert. He may be called to testify regarding his written report, file materials and deposition in this case.

15. Malinda Tollefson, Professional Counseling Services, 50 Shoshone Ave., Ste B, Green River, WY 82935 (in person or by prior deposition testimony). Mrs. Tollefson is the social worker who provided counseling to K.W., L.W., G.W. and W.W. She may be called to testify regarding her treatment of the Wadsworth children.

16. Scott Sulentich, Rock Springs Plastic Surgery Center, 1180 College Dr., Ste 303,

Rock Springs, WY 82901 (in person or by prior deposition testimony). Dr. Sulentic is the plastic surgeon who treated Mrs. Wadsworth for the lesions on her feet. He may be called to testify regarding his treatment of Mrs. Wadsworth.

17. Michael Schulz, 915 Highland Pointe Dr., Ste 250, Roseville, CA 95678 (in person). Mr. Schulz is the Plaintiffs' designated origin expert. He may be called to testify regarding his written report, file materials and deposition in this case.

18. Christopher LaChapelle, University of Utah Hospital, 50 N. Medical Drive, Salt Lake City, Utah 84132 (in person or by prior deposition testimony). Dr. LaChapelle is one of Mrs. Wadsworth and W.W.'s treating physicians and may be called to testify regarding their injuries and treatment.

19. Callie Thompson, University of Utah Hospital, 50 N. Medical Drive, Salt Lake City, Utah 84132 (in person or by prior deposition testimony). Dr. Thompson is one of Mrs. Wadsworth and W.W.'s treating physicians and may be called to testify regarding their injuries and treatment.

Defendants reserve the right to call any witness designated by the Plaintiffs in this case.